# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS TYLER DIVISION

Ashley Adams., et al §	
Plaintiffs, §	
<b>§</b>	
§	
v. § Civil Action No. 6:13	-cv-712
§	
§	
Brad Livingston, et al §	
Defendants. § Jury Demanded	

#### **DEFENDANTS' NOTICE OF INITIAL DISCLOSURE**

Defendants, Texas Department of Criminal Justice, Robert Eason, Dennis Miller, Reginald Goings, Debra Gilmore, Reyvoda Dodd, Doris Edwards, Brandon Matthews, Sarah Raines, and Tully Flowers, through counsel, submit that they have complied with federal and local rules pertaining to the duty to disclose relevant documents and information to all concerned parties.

Respectfully submitted,

**GREG ABBOTT** 

Attorney General of Texas

**DANIEL T. HODGE** 

First Assistant Attorney General

**DAVID C. MATTAX** 

Deputy Attorney General for Defense Litigation

KAREN D. MATLOCK

Assistant Attorney General Chief, Law Enforcement Defense Division

/s/ Bruce R. Garcia

**BRUCE R. GARCIA** 

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#### ATTORNEYS FOR DEFENDANTS

Texas Department of Criminal Justice, Robert Eason, Dennis Miller, Reginald Goings, Debra Gilmore, Reyvoda Dodd, Doris Edwards, Brandon Matthews, Sarah Raines, and Tully Flowers

### NOTICE OF ELECTRONIC FILING

I, **BRUCE R. GARCIA**, Assistant General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above an foregoing in accordance with the Electronic Case Files System of the Eastern District of Texas, on the 30<sup>th</sup> day of October, 2013.

/s/ Bruce R. Garcia
BRUCE R. GARCIA
Assistant Attorney General

## **CERTIFICATE OF SERVICE**

I, **BRUCE R. GARCIA**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing **Defendants' Notice of Initial Disclosure** has been served by placing same in the United States Mail, postage prepaid, on this the 30<sup>th</sup> day of October, 2013, addressed to:

Jeff Edwards
Scott Medlock
The Edwards Law Firm
The Bremond Houston House
706 Guadalupe
Austin, Texas 78701

Via CM# 7008 0500 0001 5048 6194

Kim Coogan Office of the Attorney General P.O. Box 12548 Austin, Texas 78711

Demetri Anastasiadis Office of the Attorney General P.O. Box 12548 Austin, Texas 78711 Via hand delivery

Via hand delivery

/s/ Bruce R. Garcia
BRUCE R. GARCIA
Assistant Attorney General